

Portland Harbor Superfund Site

- Background: The Portland Harbor Superfund Site was listed on the National Priorities List in December 2000 based on sediment contamination in the lower Willamette River. Ten Potentially Responsible Parties (PRPs), known as the Lower Willamette Group (LWG), are conducting a multi-year investigation under EPA oversight, in accordance with an Administrative Order on Consent (AOC).
- The LWG has conducted several years of data collection, and completed the final round of sampling for Remedial Investigation (RI) and Risk Assessment in January, 2008. Laboratory analysis of the data was recently completed. Three key documents that are expected to be submitted in spring of 2009 will present and evaluate the extensive data that has been collected:
 - The draft Remedial Investigation (RI) Report
 - The draft baseline Human Health Risk Assessment
 - The draft Ecological Risk Assessment.

These documents are being prepared by contractors for the LWG. EPA and a team of federal, state and tribal cooperating partners will review the documents and they will be available for public viewing and discussion after they are received by EPA. EPA recently provided direction to the LWG on how to complete specific elements of the RI and risk assessment reports, including evaluation of human health and ecological risk scenarios and study area boundaries.

EPA is also working with the LWG on the initial phase of the Feasibility Study, which will develop and evaluate cleanup options. A cleanup alternatives screening report should be available in summer of 2009. The RI, Risk Assessment and FS reports will provide the basis for EPA's Proposed Plan for cleanup of the site, which EPA expects to prepare and release for public comment in 2010. EPA will issue a Record of Decision after completion of the public review process.

- On January 18, 2008, EPA Region 10 sent letters to approximately 280 current and former property owners, tenants, or facility operators in the general vicinity of the Portland Harbor Superfund Site. These letters requested information that will help EPA learn more about the materials handled at these sites, past practices and known or suspected releases of contamination to the Willamette River. The letters are part of EPA's information gathering process and search for potentially responsible parties under the authority provided by Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).
- One early action cleanup has been completed at the GASCO facility and additional early actions are in the planning stages. These early action opportunities are:
 - GASCO - NW Natural conducted a removal action in 2005 that pulled 15,000 cubic yards of tar out of the Willamette. This removal of tar likely represents less than 10% of the contaminated mass that is located adjacent to their site, and there is a need to remove additional product and contaminated sediments to address

areas of unacceptable risk. In addition to benthic toxicity associated with the waste material, water quality standards have been exceeded for PAH constituents. EPA is contemplating another early action here as it still represents a major hotspot of contamination. Starting early means early risk reduction and getting a jump on overall cleanup sequencing by targeting some of the worst contamination first for management of dredging residuals.

- Terminal 4 – The Port conducted an Engineering Evaluation/Cost Analysis (EE/CA), and dredging with disposal in a near shore confined disposal facility (CDF) was selected as the remedy. Certain areas will be capped or allowed to naturally recover as well. At the 60% design phase, however, the Port began to balk at the design requirements for the CDF and in January 2007 invoked informal dispute. After months of negotiating, the Port approached EPA with a plan to defer this removal action, citing rapidly escalating costs and their desire to re-align the project schedule with the harbor-wide RI/FS. EPA agreed to delay the construction of the CDF, and the Port agreed to move forward with a more limited sediment removal action this summer to address some high risk areas. The CDF design will be incorporated into the Feasibility Study evaluation to ensure it is designed consistently with harbor-wide performance standards.

The T-4 sediment removal action is currently underway. It includes dredging and capping of hot spots of contamination, as well as stabilizing a bank along the Willamette River to control erosion. This phase will last approximately five weeks and includes dredging and transporting approximately 14,000 cubic yards of contaminated sediment to an off-site disposal facility and isolating contaminated sediment in the back of Slip 3 with a cap made of an organoclay-sand mix. Water quality monitoring will occur regularly during the dredging and capping processes. The Port has required that ultra-low sulfur diesel fuel be used in all heavy equipment on-site, which will reduce air impacts associated with cleanup work.

- Arkema – At another one of the harbor's worst hot spots, informal and formal disputes have delayed the EE/CA and cleanup. Arkema/LSS is evaluating the siting of a new near-shore CDF, in addition to dredging and off-site disposal options, for their "hot spot" of DDT contaminated sediments. EPA envisions early cleanups to be of a focused nature, and use existing disposal options to speed up the cleanup process and deliver early risk reduction.

In addition to these early action sites, progress is continuing at other facilities

- U.S. Moorings – In October 2007, EPA issued a Unilateral Administrative Order to the US Army Corps of Engineers to conduct monitoring, testing and analysis of contamination at this Federal Facility. The first phase of sampling was recently completed. This work was delayed by the Corps' unwillingness to conduct the work under a consent agreement with EPA and the Corps' disputing of EPA's authority to issue a unilateral order under RCRA.

- Triangle Park – In December 2006, EPA entered a Bonafide Prospective Purchaser Agreement with the University of Portland to complete some assessment and cleanup on this site to enable the UP's purchase of the site for construction of athletic fields. The University is moving forward with purchase of the property.